

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TAMARA LOHR and RAVIKIRAN SINDOGI,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

NISSAN NORTH AMERICA, INC., and
NISSAN MOTOR CO., LTD.,

Defendants.

Case No. 2:16-cv-01023-RSM

**STIPULATED SUPPLEMENT TO
PROTECTIVE ORDER**

Pursuant to L.R. 26(c) and the parties' agreement, this Court's Protective Order (Dkt. 54) is hereby supplemented as follows:

1. Confidential material, as defined in the Protective Order entered in this matter (Dkt 54) ("the Order"), must be stored and maintained by a Receiving Party at a location and in a secure manner that ensures that access is limited to the persons authorized under the Order. Receiving Parties shall exercise the same care with regard to the storage, custody, or use of confidential material as they would apply to their own material of the same or comparable confidentiality and sensitivity. Receiving Parties must take reasonable precautions to protect confidential material from

1 loss, misuse and unauthorized access, disclosure, alteration and destruction, including but not limited
2 to:

3 (a) Confidential material in electronic form shall be maintained in a secure
4 litigation support site that applies standard industry practices regarding data security, including but
5 not limited to application of access control rights to those persons entitled to access confidential
6 material under the Order;

7 (b) A list of current and former authorized users of the Receiving Party's litigation
8 support site shall be maintained while this litigation, including any appeals, is pending;

9 (c) Any confidential material downloaded from the litigation support site in
10 electronic format shall be stored only on devices (e.g., laptop, tablet, smartphone, USB drive) that are
11 password protected and/or encrypted with access limited to persons entitled to access confidential
12 material under the Order. If the user is unable to password protect and/or encrypt the device, then
13 the confidential material shall be password protected and/or encrypted at the file level;

14 (d) Confidential material in paper format is to be maintained in the Receiving
15 Party's counsel's law offices or comparably secure location, with access limited to persons entitled
16 to access Protected Information under the Order; and;

17 (e) If a data breach occurs or a Receiving Party reasonably believes a breach may
18 have occurred, Receiving Party shall immediately report such incident to the Designating Party,
19 describe the confidential material accessed without authorization, and use best efforts to return to the
20 Designating Party confidential material copied or removed. In such event, the Receiving Party shall
21 immediately take such actions as Designating Party shall request in good faith to remediate the breach,
22 to preclude further breaches, and to address publicity regarding the breach, and in any event take such
23 actions as are required by applicable laws, including privacy laws. After notification, the Receiving
24 Party shall keep the Designating Party informed of remediation efforts.

25 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

26 RESPECTFULLY SUBMITTED AND DATED this 29th day of March 2018.

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 2 day of April 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE